

National Defense Authorization Act (NDAA) that was signed into law last week.

Unlike earlier versions of the NDAA, the final enacted bill does not:

Designate any PFAS as hazardous substances under the Comprehensive Environmental Response, Compensation, and Liability Act.

Require the EPA to list PFAS on the Clean Water Act toxic pollutant list, nor does it require the agency to publish enforceable standards for PFAS.

Direct the EPA to set a national drinking water standard for any PFAS under the Safe Drinking Water Act (SDWA).

PFAS provisions in NDAA include the following:

At military installations, the final bill prohibits the use of firefighting foam containing PFAS after October 1, 2024, and immediately prohibits usage in training exercises.

Immediate addition of perfluorooctanoic acid (PFOA), perfluorooctane sulfonic acid (PFOS) and certain other PFAS or classes of PFAS—including GenX—to the Toxics Release Inventory (TRI).

Interim Recommendations to Address Groundwater Contaminated with PFOA and PFAS, December 19, 2019

EPA recently formalized a screening level of 40 parts per trillion (ppt) to determine if PFOA and/or PFOS are present at a site. If so, it could warrant further attention, with EPA's PFOA and PFOS Lifetime Drinking Water Health Advisory level of 70 ppt set as the preliminary remediation goal for contaminated groundwater.

No.	Analyte	Acronym	CASRN	Method 537.1	Method 533
1	N-ethyl perfluorooctanesulfonamidoacetic acid	NEFOSAA	2991-50-6	✓	
2	N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9	✓	
3	Perfluorotetradecanoic acid	PFTA	376-06-7	✓	
4	Perfluorotridecanoic acid	PFTDA	72629-94-8	✓	
5	4,8-dioxa-3H-perfluorononanoic acid ¹	ADONA	919005-14-4	✓	✓
6	11-chloroeicosafluoro-3-oxaundecane-1-sulfonic acid ²	11Cl-PF3Quds or (F-538 minor)	763051-92-9	✓	✓
7	9-chlorohexadecafluoro-3-oxanone-1-sulfonic acid ³	9Cl-PF3ONS or (C8 Cl-PFESA) or (F-538 major)	756426-58-1	✓	✓
8	Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6	✓	✓
9	Perfluoroundecanoic acid	PFUnA	2058-94-8	✓	✓
10	Perfluorodecanoic acid	PFDA	335-76-2	✓	✓
11	Perfluorododecanoic acid	PFDoA	307-55-1	✓	✓
12	Perfluorohexanoic acid	PFHxA	307-24-4	✓	✓
13	Perfluorobutanesulfonic acid	PFBS	375-73-5	✓	✓
14	Perfluoroheptanoic acid	PFHpA	375-85-9	✓	✓
15	Perfluorohexanesulfonic acid	PFHxS	355-46-4	✓	✓
16	Perfluorononanoic acid	PFNA	375-95-1	✓	✓
17	Perfluorooctanesulfonic acid	PFOS	1763-23-1	✓	✓
18	Perfluorooctanoic acid	PFOA	335-67-1	✓	✓
19	Nonafluoro-3,6-dioxahexanoic acid	NFDHA	151772-58-6		✓
20	Perfluoro (2-ethoxyethane) sulfonic acid	PFEESA	113507-82-7		✓
21	Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1		✓
22	Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5		✓
23	Perfluorobutanoic acid	PFBA	375-22-4		✓
24	Perfluoroheptanesulfonic acid	PFHpS	375-92-8		✓
25	Perfluoropentanoic acid	PFPeA	2706-90-3		✓
26	Perfluoropentanesulfonic acid	PFPeS	2706-91-4		✓
27	1H, 1H, 2H, 2H-perfluorohexane sulfonic acid	4:2 FTS	757124-72-4		✓
28	1H, 1H, 2H, 2H-perfluorooctane sulfonic acid	6:2 FTS	27619-97-2		✓
29	1H, 1H, 2H, 2H-perfluorodecane sulfonic acid	8:2 FTS	39108-34-4		✓

